

EXHIBIT P

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

NATIONAL EDUCATION
ASSOCIATION, et. al.

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION; et al.

Defendants.

Case No.: 1:25-cv-00091

**DECLARATION OF MEMBER I IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION**

**DECLARATION OF MEMBER I IN SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

I, [REDACTED], hereby declare that

1. My name is Member I. I am over the age of 18 and have personal knowledge of the facts stated herein. If called to testify, I could and would do so competently.
2. I submit this Declaration in my individual capacity and not on behalf of the institution that I attend.
3. I am a member of NEA.

4. I am a student at a large Midwest university. My university receives funding from the Department of Education.
5. I am currently studying elementary education and will soon be entering my sixth and final year of higher education. My courses have focused on special education, methods courses, and the science of reading. My courses include information on inclusive strategies such as Universal Design for Learning (UDL), differentiated instruction, assistive technology, Positive Behavior Interventions and Supports (PBIS), social-emotional learning, and trauma-informed teaching. My curriculum encourages fostering a culture of belonging through culturally responsive teaching.
6. I am aware that on February 14, 2025, the U.S. Department of Education issued a Dear Colleague Letter and related guidance threatening colleges with investigation and the potential loss of federal funding for teaching or scholarship related to diversity, equity and inclusion (DEI).
7. Since February 14, 2025, the content of my courses have changed so as to deprive me of the opportunity to learn about diversity, equity, and inclusion (DEI) in the context of working with students from different backgrounds. The children's literature classes have removed the focus on cultural responsiveness, and my university will be removing the education DEI course. As I learn to work with children, I am aware of the different backgrounds of the students I will get to teach. I worry that these students will get less access to education by taking away the focus on how to understand and respond to different cultures and backgrounds.
8. I fear that additional changes to our curriculum related to DEI will be required, further diminishing the quality of education that I receive.

9. As part of my preparation to be a K-12 teacher, I will be student teaching this upcoming year. I worry about the impact the Dear Colleague Letter on my ability to student teach using the course content and teaching methods that will be accessible and meaningful for all students. I live in a city that has a large immigration population, with the majority being from Mexico or West Africa. I want to be able to ensure that my students are able to see themselves in the learning, and feel welcome in their class.
10. The Dear Colleague Letter and related guidance from the Department of Education should not be permitted to suppress academic speech on DEI. I personally find the Dear Colleagues Letter to be extremely concerning as the language feels accusatory and vicious towards readers. As long as these restrictions remain in place, I fear I will be unable to fully fulfill my role as an education student or an educator in the future by speaking freely on this essential topic.
11. I am submitting this declaration anonymously because I fear retaliation from my university as well as harassment and threats from members of the public for challenging the policies of the Trump administration restricting teaching and discussion that deals with issues of race, disability, and gender.

I declare under penalty of perjury that the above is true and correct.

Executed this 20th day of March, 2025.

